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PACIFIC  **TELESIS**
Group-Washington

May 28, 1996

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

Re: *CC Docket No. 92-237, Administration of the North American Numbering Plan*

On behalf of Pacific Telesis Group, please find enclosed an original and six copies of its "Reply Comments" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosure

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Administration of the
North American Numbering Plan

CC Docket No. 92-237

REPLY COMMENTS OF PACIFIC TELESIS GROUP

Only a handful of parties filed comments in response to the Public Notice issued by the Commission seeking further comments on the appropriate length of the transition period for CICs. Generally, there was agreement that the transition period must be shorter than the 6 years proposed by the Commission a few years ago. In addition, commenters agreed that the Commission should remove the CIC limit imposed last year.

Most commenters endorse a transition period of substantially less than 6 years. In fact, most commenters recognize that the transition period began about a year ago, and should only be allowed to continue until the end of this year,¹ until next February,²

¹ Comments of SBC Communications; Comments of GTE; USWest Further Comments.

² Comments of Cincinnati Bell.

by mid-1997,³ or by the end of 1997.⁴ Most therefore, endorse a transition period that will end within the next 18 months.

Only AT&T, Vartec and Telco Communications endorse a longer transition period. Their arguments are not reasonable. AT&T claims that CPE (PBX) vendors need a long transition period in order to perform upgrades to the hardware and software to recognize 4 digit CICs. However, as Bell Atlantic correctly points out, the industry has known since 1988 that 4 digit CICs would be assigned and have had 8 years to prepare for the transition. In fact, since other equipment vendors, who were very vocal in this proceeding 4 years ago, have not filed comments in this round, it is safe to assume that the technical issue has been solved in the intervening years. Most PBX and COPT payphones have probably already been upgraded to accept the longer CIC.

Vartec and Telco Communications claim that the transition period should be 6 years and 12 years, respectively. Each of these parties claim that they need these years to educate customers about the change in dialing. However, no one can seriously believe that these companies will be educating their customers over this time period. Instead, these companies simply want status quo and, even if a 12 year period were ordered, would only educate customers during the last few months. Customers are used to dialing changes being implemented upon relatively short notice. 6 months to a year is adequate notice.

³ Nynex Comments


⁴ Comments of BellSouth.

All companies were in agreement that the Commission should not continue the CIC embargo currently underway which limits the quantity of CICs to an entity. As USWest points out, this stifles competition and allows only those entities with the most CICs to enter new markets.

The Commission should limit the transition period for Feature Group D CICs⁵ such that a single dialing scheme will be used by all customers by next year. The Act requires dialing parity, and equality between carriers. Dialing disparity does not meet that concept.

Respectfully submitted,

PACIFIC TELESIS GROUP


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Date: May 28, 1996

⁵ MCI incorrectly states that a transition period for Feature Group B CICs is underway. No transition period was needed for the FGB expansion to 4 digits because the same number of digits (950-XXXX) is dialed whether a 3 digit or 4 digit CIC is used.